

**McMANIMON, SCOTLAND & BAUMANN, LLC**  
427 Riverview Plaza  
Trenton, New Jersey 08611  
(609) 695-6070  
Andrea Dobin ([adobin@msbnj.com](mailto:adobin@msbnj.com))  
Michele M. Dudas, Esq. ([mdudas@msbnj.com](mailto:mdudas@msbnj.com))  
*Attorneys for Thomas J. Orr, Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

JOHN MICHAEL WALSH and ROSEMARY  
JOANNE WALSH,

Debtors.

Case No. 19-13567 (KCF)

Honorable Kathryn C. Ferguson, Chief U.S.B.J.

Chapter 7

**Hearing Date and Time:**

**January 28, 2020, at 10:00 a.m.**

**NOTICE OF MOTION OF THOMAS J. ORR, CHAPTER 7 TRUSTEE,  
FOR AN ORDER (I) COMPELLING DEBTORS TO COMPLY WITH  
TRUSTEE'S REQUESTS FOR INFORMATION, INCLUDING  
OUTSTANDING REQUESTS OF RULE 2004 SUBPOENA; (II)  
COMPELLING TURNOVER OF NON-EXEMPT ASSETS; (III)  
HOLDING DEBTORS IN CONTEMPT FOR FAILURE TO COMPLY  
WITH TERMS OF PRIOR ORDER ENTERED SEPTEMBER 12, 2019;  
AND (IV) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that on **January 28, 2020, at 10:00 a.m.** or as soon thereafter as the movant may be heard, Thomas J. Orr, Chapter 7 Trustee (the "Trustee") in the bankruptcy proceeding of John Michael Walsh and Rosemary Joanne Walsh, Chapter 7 debtors ("Debtors") will move before the Honorable Kathryn C. Ferguson, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court, U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order (I) compelling the Debtors to comply with Trustee's requests for information, including outstanding requests of Rule 2004 Subpoena served by the Trustee; (II) compelling turnover of non-exempt assets; (III) holding Debtors in contempt

for failure to comply with terms of prior Order entered September 12, 2019; and (IV) granting related relief (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, the Trustee will rely upon the enclosed Certification of Michele M. Dudas, Esq. and Letter Brief filed in support of the relief requested.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

**PLEASE TAKE FURTHER NOTICE** that as the Motion does not involve any complex issue of law, no brief is required.

**PLEASE TAKE FURTHER NOTICE** that unless an objection is timely filed and served, the Motion shall be deemed unopposed and the relief may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

**McMANIMON, SCOTLAND & BAUMANN, LLC**  
*Counsel to Thomas J. Orr, Chapter 7 Trustee*

Dated: January 7, 2020

By: /s/ Michele M. Dudas  
MICHELE M. DUDAS